

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

UNITED STATES DEPARTMENT
OF AGRICULTURE,

PLAINTIFF

v.

CHRISTINE A. FORTIN,

DEFENDANT

CIVIL ACTION NO.:

1:25-cv-00167-SDN

RESPONSE TO ORDER TO SHOW

NOW COMES the United States Department of Agriculture (the “Plaintiff”), by and through its undersigned Counsel and responds to the Court’s Order to Show Cause [Dkt. No. 5] (the “Show Cause Order”) as follows:

1. On April 14, 2025, the Plaintiff filed a complaint for foreclosure and order of sale against the Defendant, Christine A. Fortin (“Defendant” or “Ms. Fortin”), respecting the real property located at or about at 194 Main Street, Presque Isle, ME 04769. (the “Property”).
2. On or about July 17, 2025, Plaintiff received an Affidavit of Attempted Service signed by Sheriff Doughty of the Aroostook County, Maine Sheriff’s Department. The affidavit states that during the first attempt at service, the Defendant’s last known address was found to be incorrect, and the listed telephone number was disconnected. During the second attempt, Sheriff Doughty contacted the local post office to obtain updated address information for the Defendant but did not receive a response. A true and correct copy of the Affidavit of Attempted Service is attached to this response as **Exhibit 1**.

3. On or about July 16, 2025, a second potential address was identified through another skip trace, which Plaintiff intends to provide to the Aroostook Sheriff's Office in hopes of achieving service.
4. The plaintiff is prepared to file a Motion to Extend Time to Serve Summons and Complaint on Defendant Christine A. Fortin (the "Motion to Extend Time") and respectfully requests an extension of time to complete service under Fed. R. Civ. P. 4(m), as there is good cause for the delay and Plaintiff is acting in good faith to effectuate service without undue delay.
5. Dismissal at this stage would unfairly prejudice Plaintiff and defeat the interests of justice, especially given the diligent efforts already made to locate and serve the Defendant.

WHEREFORE, Plaintiff respectfully requests that the Court find good cause exists for the delay in service, grant an extension of service to **September 26, 2025**, to complete service on Defendant Christine A. Fortin, and for such other relief as the Court deems just and proper.

Dated this **July 24, 2025**.

/s/ Kevin J. Crosman

Kevin J. Crosman, Bar No. 4279
Attorney for Plaintiff

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